

EXHIBIT 4

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
LYNCHBURG DIVISION

CHRISTOPHER WITHERS,

Plaintiff,

v.

SAM GREEN, et al.

Defendants.

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Case No. 6:20cv65

DECLARATION OF ISAIAH ENGEL

Commonwealth of Virginia, County of Campbell to wit:

1. My name is Isaiah Engel.
2. I am over the age of eighteen (18) and competent to declare the matters contained herein.
3. I base the information contained in this Declaration on my personal knowledge.
4. I am a member of the Rustburg Volunteer Fire Department.
5. I am the individual identified in the photograph enclosed with this Declaration as Attachment A.
6. On the night of September 29, 2018, I along with other members of the Rustburg Volunteer Fire Department responded to a call near Old Rustburg Road in Campbell County.
7. That same night, we were alerted by dispatch that a pursuit was headed straight for us responding to a vehicle versus structure call. Second later we saw a vehicle approaching at a high rate of speed. We stopped the fire engine in the road, and the vehicle stopped within feet of the truck's bumper.

8. It appeared to me as if the driver was trying to run from the vehicle.

9. I got out of the fire truck about this time and was only steps away from the deputies and the driver.

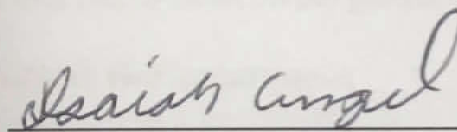
10. The deputies took the driver to the ground in a cutover off the side of the road that looked like it had recently been bush hogged or clear cut.

11. I did not observe the deputies punch, kick, or otherwise abuse the driver as they attempted to restrain him.

12. I did not observe the deputies do anything unprofessional during their attempt to restrain the driver.

13. I declare under penalty of perjury of the laws of the United States of America that the foregoing is true and correct.

Date: 10/5/21



ISAIAH ENGEL

ATTACHMENT A

